

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

PRIME PLASTIC SURGERY)
MANAGEMENT LLC and PRIME)
PLASTIC SURGERY ASSOCIATES) C.A. No.)
CORP.,)
)
)
Plaintiffs,)
)
)
v.)
)
)
GILBERT W. LEE, M.D. and)
)
CALIFORNIA INSTITUTE OF PLASTIC)
)
AND RECONSTRUCTIVE SURGERY)
)
)
Defendants.)

**PLAINTIFFS' MOTION FOR TEMPORARY
RESTRAINING ORDER AND PRELIMINARY INJUNCTION**

Plaintiffs Prime Plastic Surgery Management LLC (“Prime Management”) and Prime Plastic Surgery Associates Corp., (“Prime Associates) (collectively, “Prime”) by their undersigned counsel, in support of their Motion for Temporary Restraining Order and Preliminary Injunction, states as follows:

1. This is a motion to stop Defendant Dr. Gilbert Lee and the corporation he continues to own, from interfering with a website and domain name—changesplasticsurgery.com—that he sold and to which he no longer has any rights. After selling his medical practice, including its website and domain name, and receiving more than \$1 million in cash plus stock as compensation, Dr. Lee has failed to transfer the domain name of the website to its rightful owner—Prime Management. Instead, he has attempted to use his control over the website to obtain leverage in other disputes he has with Prime Management.

2. Dr. Lee's actions violate the federal Anticybersquatting Consumer Protection Act (15 U.S.C. § 1125, *et seq.*) and his express, unambiguous contract obligations.

3. For these reasons, as detailed in Plaintiff's Brief in Support of their Motion for Temporary Restraining Order and Preliminary Injunction, including a declaration and exhibits, Plaintiff requests an order which (a) restrains Dr. Lee from using the domain name in any manner that would interfere with a user accessing the Prime Management website to which the domain name is currently directed; and (b) orders Dr. Lee to turn over to Prime Management registration of the domain name.

March 28, 2025

Respectfully submitted,

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